

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03 MDL 1570 (GBD) (FM)  
ECF Case

*This document relates to:*

*All cases*

**MOTION FOR ADMISSION PRO HAC VICE**

PURSUANT TO RULE 1.3 (c) of the local rules of the United States

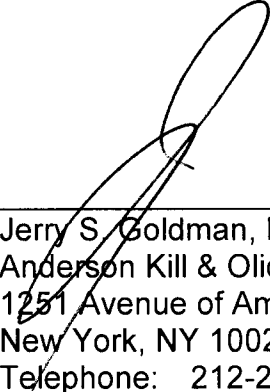
District Court for the Southern District of New York, I, Jerry S. Goldman, counsel for the Plaintiffs in Estate of John P. O'Neill, Sr., *et al.* v. Al Baraka Investment & Development Corp., *et al.* 04-CV-1923 (GBD) (FM), Estate of John P. O'Neill, Sr., *et al.* v. Republic of Iraq, *et al.* 04-CV-1076 (GBD) (FM), and Estate of John P. O'Neill, Sr., *et al.* v. Kingdom of Saudi Arabia, *et al.* 04-CV-1922 (GBD) (FM) (collectively "O'Neill Plaintiffs"), and a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *Pro Hac Vice* of

Applicant Names: Mark E. Gottlieb ("Gottlieb")  
William H. Pillsbury ("Pillsbury") and  
Darin J. McMullen ("McMullen")  
Firm Name: Anderson Kill & Olick, P.C.  
Address: 1600 Market Street, Suite 2500  
Philadelphia, PA 19103  
Phone Number: (267) 216-2700  
Fax Number: (215) 568-4573  
Email Addresses: Gottlieb: MGottlieb@andersonkill.com  
Pillsbury: WPillsbury@andersonkill.com  
McMullen: DMcMullen@andersonkill.com

Mark E. Gottlieb is a member in good standing of the Bar of the State of Pennsylvania. William H. Pillsbury is a member in good standing of the Bar of the States of New Jersey and Pennsylvania. Darin J. McMullen is a member in good standing of the Bar of the State of Pennsylvania. All relevant certificates of good standing are attached as Exhibit A.

There are no pending disciplinary proceedings against Mark E. Gottlieb, William H. Pillsbury, or Darin J. McMullen in any State or Federal Court.

Dated: September 8, 2008  
New York, N.Y.



---

Jerry S. Goldman, Esq. (JG8445)  
Anderson Kill & Olick, PC  
1251 Avenue of Americas  
New York, NY 10020  
Telephone: 212-278-1000  
Facsimile: 212-278-1733

*Attorneys for the Plaintiffs  
Estate of John P. O'Neill, Sr. et al.*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	03 MDL 1570 (GBD)(FM) ECF Case
--	-----------------------------------

*This document relates to:*

*All cases*

**AFFIDAVIT OF JERRY S. GOLDMAN**  
**IN SUPPORT OF MOTION TO ADMIT COUNSEL, PRO HAC VICE**

1. I am a member of the law firm of Anderson Kill & Olick, P.C., attorneys for the Plaintiffs in Estate of John P. O'Neill, Sr., *et al.* v. Al Baraka Investment & Development Corp., *et al.* 04-CV-1923 (GBD) (FM), Estate of John P. O'Neill, Sr., *et al.* v. Republic of Iraq, *et al.* 04-CV-1076 (GBD) (FM), and Estate of John P. O'Neill, Sr., *et al.* v. Kingdom of Saudi Arabia, *et al.* 04-CV-1922 (GBD)(FM) (collectively "O'Neill Plaintiffs"), and serve on the Plaintiffs' Executive Committee for Personal Injury and Death Claims in all of the actions consolidated in the captioned proceedings. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of the O'Neill Plaintiffs Motion to admit Mark E. Gottlieb, William H. Pillsbury, and Darin J. McMullen as counsel *Pro Hac Vice* to represent the O'Neill, in this matter.

2. I am a member in good standing of the Bars of the State of New York, Pennsylvania, and Massachusetts and my State Bar Identification numbers are 130254, 37249 and 199100 respectively. I was admitted to practice law in the State of New York in April, 1977.

3. I have been admitted to practice before the Southern District of New York since May of 1980 and I am in good standing with this Court.

4. I have known Mark E. Gottlieb ("Gottlieb") since the fall of 2006; I have known William H. Pillsbury ("Pillsbury") and Darin J. McMullen ("McMullen") since May, 2008.

5. Mr. Gottlieb is a member, and Messrs. Pillsbury and McMullen are associated with the law firm of Anderson Kill & Olick, P.C., located in its Philadelphia, Pennsylvania office.

6. Mark E. Gottlieb is a member in good standing of the Bar of the State of Pennsylvania. William H. Pillsbury is a member in good standing of the Bar of the States of New Jersey and Pennsylvania. Darin J. McMullen is a member in good standing of the Bar of the State of Pennsylvania. All relevant certificates of good standing are attached as Exhibit A.

7. There are no pending disciplinary proceedings against Mark E. Gottlieb, William H. Pillsbury, or Darin J. McMullen in any State or Federal Court.

8. I respectfully submit a proposed Order granting the admission of Mark E. Gottlieb, William H. Pillsbury, and Darin J. McMullen, *Pro Hac Vice*, to represent Plaintiffs Estate of John P. O'Neill, Sr. *et al.*, in the above captioned matter.

WHEREFORE, it is respectfully requested that the motion to admit Mark E. Gottlieb, William H. Pillsbury, and Darin J. McMullen, in the above captioned matter, be granted.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: September 8, 2008

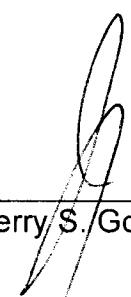


---

Jerry S. Goldman

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the Motion to Admit Mark E. Gottlieb, William H. Pillsbury, and Darin J. McMullen *Pro Hac Vice* was served via electronic mail, on September 8, 2008, all counsel of record.



---

Jerry S. Goldman, Esq.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
--	------------------------------------

*This document relates to:*

*All cases*

**ORDER FOR ADMISSION FOR PRO HAC VICE ON WRITTEN MOTION**

Upon the motion of Jerry S. Goldman, attorney for the Plaintiffs Estate of John P. O'Neill, Sr. *et al.* ("O'Neill Plaintiffs") and said sponsor attorney's affidavit in support,

**IT IS HEREBY ORDERED** this \_\_\_\_\_ day of \_\_\_\_\_ that said motion is GRANTED and that

Applicant Name: Mark E. Gottlieb ("Gottlieb")  
Firm Name: Anderson Kill & Olick, P.C.  
Address: 1600 Market Street, Suite 2500  
Philadelphia, PA 19103  
Phone Number: (267) 216-2700  
Fax Number: (215) 568-4573  
Email Addresses: MGottlieb@andersonkill.com

Applicant Name: William H. Pillsbury  
Firm Name: Anderson Kill & Olick, P.C.  
Address: 1600 Market Street, Suite 2500  
Philadelphia, PA 19103  
Phone Number: (267) 216-2700  
Fax Number: (215) 568-4573  
Email Addresses: WPillsbury@andersonkill.com

And

Applicant Name: Darin J. McMullen  
Firm Name: Anderson Kill & Olick, P.C.  
Address: 1600 Market Street, Suite 2500  
Philadelphia, PA 19103  
Phone Number: (267) 216-2700  
Fax Number: (215) 568-4573  
Email Addresses: McMullen: DMcMullen@andersonkill.com

are admitted to practice *Pro Hac Vice* as counsel for the O'Neill Plaintiffs in the above captioned cases in the United States District Court for the Southern District of New York. All attorney's appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. Counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov).

---

George B. Daniels  
United States District Judge





Supreme Court of Pennsylvania

**CERTIFICATE OF GOOD STANDING**

***Mark E. Gottlieb, Esq.***

**DATE OF ADMISSION**

***November 18, 1977***

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: August 8, 2008

A handwritten signature in black ink, appearing to read "Patricia A. Johnson", written over a horizontal line.

Patricia A. Johnson  
Chief Clerk

# Supreme Court of New Jersey

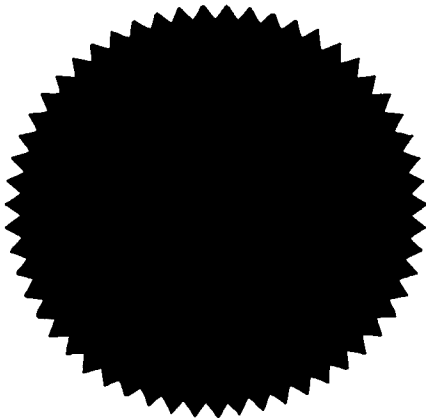


## Certificate of Good Standing

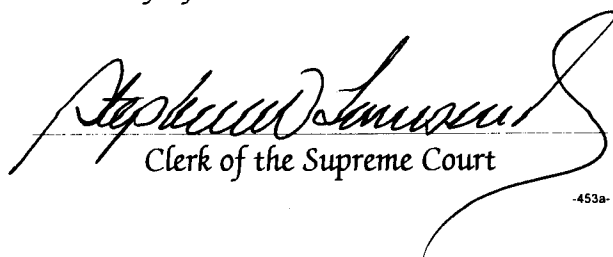
This is to certify that **WILLIAM H PILLSBURY**  
(No. **017202004** ) was constituted and appointed an Attorney at Law of New  
Jersey on **March 15, 2005** and, as such,  
has been admitted to practice before the Supreme Court and all other courts of this State  
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in  
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"  
if the Court's records reflect that the attorney: 1) is current with all assessments  
imposed as a part of the filing of the annual Attorney Registration Statement, including,  
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client  
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not  
resigned from the Bar of this State; and 4) has not been transferred to Disability  
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's  
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to  
practice law in this State.*



In testimony whereof, I have  
hereunto set my hand and  
affixed the Seal of the  
Supreme Court, at Trenton, this  
12TH day of August , 20 08

  
Clerk of the Supreme Court



Supreme Court of Pennsylvania

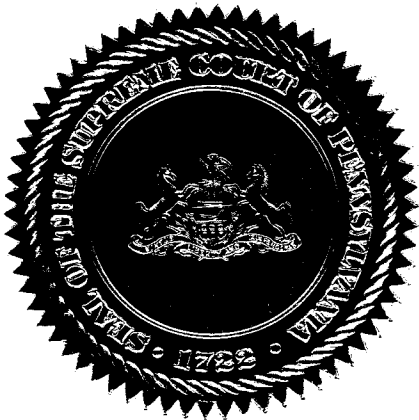
**CERTIFICATE OF GOOD STANDING**

***William H. Pillsbury, Esq.***

**DATE OF ADMISSION**

***November 12, 2004***

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



**Witness my hand and official seal**

**Dated: August 8, 2008**

*Patricia A. Johnson*

Patricia A. Johnson  
Chief Clerk



Supreme Court of Pennsylvania

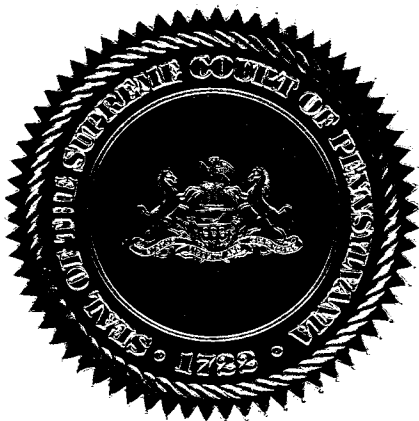
**CERTIFICATE OF GOOD STANDING**

***Darin John McMullen, Esq.***

**DATE OF ADMISSION**

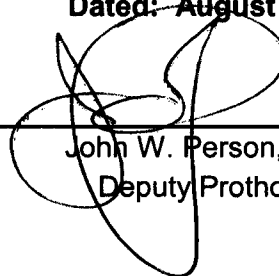
***December 19, 1996***

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



**Witness my hand and official seal**

**Dated: August 20, 2008**

  
\_\_\_\_\_  
John W. Person, Jr., Esq.  
Deputy Prothonotary